

From: Alison Leary Mooradian [mailto:alisonlearymooradian@gmail.com]
Sent: Thursday, April 05, 2012 4:22 PM
To: Baskin, Kathleen (EEA)
Cc: Linda.Orel@maccweb.org
Subject: Sustainable Water Management Initiative (SWMI).

Dear Ms. Baskin,

The goal of sustainable water management should be to use water wisely, so that our rivers, streams and wetlands have enough clean water to support healthy populations of native fish. Protecting the rivers that are healthy, and restoring those that are not, should be explicit goals of SWMI.

Currently, 292 sub-basins in Massachusetts – more than 20% – are seriously degraded by water withdrawals, and another 227 are losing fish and could fall into the degraded category if they were subjected to increased withdrawals. Yet the SWMI Framework proposes safe yield withdrawal limits that are several times higher than the latest science indicates is safe for fish; exempts some permitted withdrawals from having to fully minimize and mitigate the impacts of their withdrawal; and allows “non-essential” water use when flows are below safe levels. This is not sustainable water management.

Nothing in the SWMI proposal will prevent vulnerable rivers, streams and wetlands from being pumped dry, which is unacceptable. We must seize this important opportunity to begin a process of gradual restoration of degraded rivers, streams and wetlands. We should start by establishing protective safe yield withdrawal limits consistent with the latest research.

I live near the Charles River in Newton, and I am happy that significant progress has been made to improve the health of the River. However, the river continues to suffer from excessive levels of nutrients, most notably phosphorus in storm water run off. Urbanization and the resulting impervious surfaces, poor stormwater management practices, and zoning have dramatically altered the natural water cycle and the river flow. Allowing excessive withdrawals upstream works against our efforts to improve this wonderful natural resource and return this River to fishable and swimmable status.

Thank you for the opportunity to comment.

Warm Regards,

Alison Leary
192 Chapel Street
Newton, MA 02458
617-527-1182
alisonlearymooradian@gmail.com